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19 *Attorneys for Defendant*
20 *The Barajas Group*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 TRUSTEES OF THE OPERATING
15 ENGINEERS PENSION TRUST;
16 TRUSTEES OF THE OPERATING
17 ENGINEERS HEALTH AND WELFARE
18 FUND; TRUSTEES OF THE OPERATING
19 ENGINEERS JOURNEYMAN AND
20 APPRENTICE TRAINING TRUST; AND
21 TRUSTEES OF THE OPERATING
22 ENGINEERS VACATION HOLIDAY
23 SAVINGS TRUST.

Case No.: 2:24-cv-01410-APG-NJK

STIPULATION OF DISMISSAL

24 Plaintiffs,

25 vs.

26 THE BARAJAS GROUP, a Nevada
27 Corporation,

28 Defendant.

24 **IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiffs, Trustees Of
25 The Operating Engineers Pension Trust; Trustees Of The Operating Engineers Health And Welfare
26 Fund; Trustees Of The Operating Engineers Journeyman And Apprentice Training Trust; And
27 Trustees Of The Operating Engineers Vacation Holiday Savings Trust and Defendant, The Barajas
28

1 Group, through their undersigned counsel that the above-captioned action is hereby dismissed with
 2 prejudice, without cost to any party as against the other, pursuant to Rule 41(a)(1)(A)(ii) of the
 3 Federal Rules of Civil Procedure.

4 **IT IS FURTHER STIPULATED AND AGREED** that this Court will retain jurisdiction
 5 for purposes of enforcing the Parties' executed Settlement Agreement, entered into on April 17,
 6 2025.

7 **IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed
 8 in facsimile and/or electronically scanned counterparts and may be filed without further notice with
 9 the Clerk of Court.

10 Dated: Las Vegas Nevada
 11 April 25, 2025

12 **THE URBAN LAW FIRM
 13 CHRISTENSEN, JAMES & MARTIN,
 14 CHTD.**

15 By: /s/ Michael A. Urban
 16 Michael A. Urban, Esq.
 17 Nevada State Bar No. 3875
 18 Attorney for Plaintiffs
 19 7440 W. Sahara Avenue
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 20 Attorney for Plaintiffs

Dated: Cleveland, Ohio
 April 25, 2025

JACKSON LEWIS P.C.

By: /s/ David M. Pixley
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 Attorneys for Defendant, *The Barajas Group*

21
 22 IT IS SO ORDERED:
 23

24 Dated: April 29, 2025



25
 26 ANDREW P. GORDON
 27 CHIEF UNITED STATES DISTRICT JUDGE
 28